
AFFIDAVIT OF LEMA MOUSILLI

STATE OF TEXAS §
§
COUNTY OF HARRIS §

On this day, **LEMA MOUSILLI** appeared before me, the undersigned notary public, and after I administered an oath to her, upon her oath, she said:

1. “My name is **LEMA MOUSILLI**. I am over eighteen (18) years of age, I have never been convicted of a crime, and I am capable of making this affidavit.”
2. “I serve as counsel to Equisolar, Inc. in Cause No. 7:23-cv-00443.”
3. “I have been an attorney for 17 years and have engaged in litigation practice for the entirety of my career. I have served as attorney of record in numerous arbitration matters, and I am currently counsel in dozens of arbitrations.”
4. “It is my professional opinion that arbitrations are always more cost-effective than litigation.”
5. “A final arbitration hearing of this case would likely not take more than one day.”
6. “The arbitrator’s rate will likely be between \$400.00 and \$450.00 per hour.”
7. “One of the most cost-effective aspects of arbitration is saving discovery costs. JAMS rules greatly simplify discovery compared to litigation, resulting in significant savings.”
8. “It is my experience that, even in the simplest district court cases, discovery expenses can easily exceed \$10,000. District court cases require that Initial Disclosures be served upon the opposing party. Such disclosures involve a close look at the evidence at hand and a review of client documents in addition to summaries of legal claims and defenses. This requires at least several hours of work.”

9. "Once Initial disclosures are complete, the case moves on to more formal written discovery.

Written discovery includes Interrogatories, Requests for Production, and Requests for Admission. Preparation to draft these documents requires a close review of the pleading and a review of the facts of the case prior to the actual drafting."

10. "It is not unusual that each of these documents may take two to three hours to draft."

11. "Thus, it is entirely reasonable to assume a minimum of ten hours of legal work just to prepare Initial Disclosures and the first set of written discovery. This does not include reviewing the responses provided."

12. "There is the further matter of answering discovery propounded upon my client. The opposing party's Initial Disclosures must be reviewed, and a deficiency letter drafted and sent for any deficiencies in the disclosures along with attendant conferences with opposing counsel. This can easily take one to two hours."

13. "When Interrogatories, Requests for Production, and Requests for Admission are received, they must be reviewed for objectionable requests. Then they must be reviewed with and explained to the client. That process can take two hours, even for simple discovery requests. Once the client has responded, the responses must be reviewed and discussed with the client. That accounts for several more hours."

14. "Once the client's responses have been reviewed and clarified, the formal responses must be drafted, entailing another three to four hours per set of requests."

15. "Clearly, written discovery can easily run to 30 hours of work. Assuming a billing of \$350/hour, the cost would be over \$10,000."

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Lema Mousilli
LEMA MOUSILLI

SWORN TO and SUBSCRIBED before me on the 20th day of May 2024.



NOTARY PUBLIC

